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March 31, 2004

Docket No. 30-080-02
Regulatory Analysis & Development
PPD APMIS Station 3C71
4700 River Road, Unit 118
Riverdale, Maryland
USA 20730-1328

To the Secretary of Agriculture,
Ann Veneman:

Re: Comments on Cattle Import BSE

I am a cattle farmer on a fourth generation family farm, which I hope to pass on to my children, the fifth generation. My ancestors came form the United States in the early 1900's and settled here in Southern Manitoba. My farm is near Morden, Manitoba, approximately 120 miles north west of Grand Forks, North Dakota.

I am certain that this is not the first time you have heard that the current scientific wisdom on Bovine Spongiform Encephalopathy (BSE) holds that it is found only in older cows. The odds of a young cow having BSE is one in the many millions, and that only brains and spinal columns could contain the organisms responsible for passing sickness onto humans. Only people who eat those parts of the animal could be affected. Mixing animal tissue in cattle feed has been a banned practice in Canada since 1997. I only feed my cattle corn, corn silage, alfalfa and barley.

Up till May 2003, I have exported 4000 head per year to meat packers in Nebraska, namely Swift & Co. in Grand Island, Nebraska, and Iowa Beef Processors Ltd in Dakota City, Nebraska. They have been satisfied customers for over twelve years now, and I have never had cattle refused by those customers.

There needs to be common rules and fair enforcement with food inspection in all three countries of the North American Free Trade Agreement (NAFTA) so that science and health concerns are not used as a cover for protectionism. Canada has not banned beef imports from the United States throughout the last eleven months.

Our markets for beef are integrated because beef moves to the largest urban centers along the shortest distances. Beef moves form the U.S. producers to Canada, east of the Great Lakes, and from Western Canada to packers straight south. Canadian producers are very dependent on exports, being 60% of production, whereas the U.S. only imports 5% of its total consumption from Canada.

I attach an article by Brian Evans, Canada's Chief Veterinarian showing the problem of BSE originates in feed only.

As a farmer, all I ask is that I be allowed to sell a high quality product at a reasonable price, as I have been doing so many years in the past. After all, I have kept right on buying orange juice from Florida and raisins form California and John Deere tractors from Iowa. Please reopen the U.S. border to allow the free movement of live cattle, properly inspected, between our two countries.

Yours Truly,

Harry Dalke

Harry Dalke

HD/blm
Enclosure

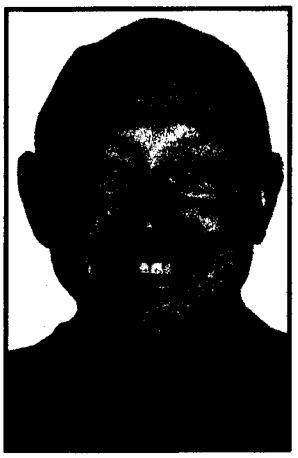
Blame the feed for BSE

Canada's chief vet explains why

The Canadian Food Inspection Agency (CFIA) reckons common sense and logic, coupled with the evidence so far, suggests Canada's mad cow predicament stems from an infected animal imported from the U.K. They believe feed supplements made from one or more of these cattle got into the feed chain before the ruminant-to-ruminant feed ban in 1997 and infected the 2 cases we've seen to date. What they can't say, because they don't know, is exactly how many cattle were exposed to this infected feed.

Speaking to veterinarians at the Western Canadian Association of Bovine Practitioners (WCABP) annual meeting, the CFIA's chief veterinarian Brian Evans stressed he and other investigators came to this conclusion by ruling out all other alternatives. They considered the potential for maternal transmission, spontaneous mutation of a prion, cross-infection with another TSE like Chronic Wasting Disease, and even the possibility of a terrorist plot. None fit the history of our 2 North American cases.

"The CFIA is confident the BSE situation in Canada can be traced to the 191 live cattle originally imported from the U.K. between 1982 and 1989 (when we stopped importing U.K. cattle)," Evans says. Believing feed is the source also bolsters their belief that the exposure of the Canadian herd to BSE was very limited because of all the things we have done to protect the feed supply going right back to the 1970s. In 1978, driven by a fear of importing foot-and-mouth disease, both Canada and the U.S. banned all imports of meat-and-bone meal (MBM) from Europe. The U.S. followed that up in 1989 with a ban on U.K. cattle; Canada's cattle ban officially came into force in early 1990. In the same year the CFIA made BSE a reportable disease and started tracking down these U.K. cattle. In 1992 they began a passive BSE surveillance program, examining the brains of these imported animals as they went for slaughter. That's how they picked up the disease in a Salers cow in 1993. She had been imported from the U.K. in 1987.



Brian Evans

By 1994 all the remaining U.K. cattle, 123 in total, were either destroyed and incinerated or shipped back to the U.K. The CFIA also incinerated the herd in which the Salers animal was found and all of her progeny that were still alive at the time. As each of these imported animals was euthanized the brain tissues were tested using the best technology at the time. Just to be sure, the CFIA pulled those 10-year-old samples out of cold storage last year and ran them through again using more modern tests. Again, they all came back negative.

All of this evidence supports the CFIA's conclusion that our BSE exposure in Canada was very low in 1993. But there is more.

In Canada, 68 of the original 191 imported cattle had been slaughtered before 1993 when the rest were removed from the herd. The U.S., based on records submitted for the Harvard Risk Assessment, imported 334 U.K. cattle between 1981 and 1989. They were able to track down 161 of them, which means 173 must have been slaughtered and processed into feed or food between 1981 and 1997 when the feed ban went into effect.

Of the 68 imports slaughtered in Canada, we know 59 were routinely slaughtered at a federal or provincial plant. Only those processed after 1992 were screened for BSE. The other 9 died on farms.

U.K. authorities tell us only 10 of the 59 U.K. cattle that were slaughtered here came from farms in the U.K. reporting a case of mad cow disease.

"That is to say, there is a chance that these 10 were exposed to infected feed [in the U.K.]," adds Evans. On average, BSE-infected herds in the U.K. only have 2 or 3 positive animals. In some herds, only one animal ever catches the infection. So it's unlikely all 10 of those exposed in the U.K. were carrying the BSE prion.

All of this tells Evans that very little BSE-infected material could have been cycling in Canadian feed before late 1997 when we removed it as a threat with the feed ban. Having said all that, we have to recognize that it doesn't take much infected feed to pass on BSE. Science is starting to determine just how little.

Gerald Wells, a veterinary pathologist with the Veterinary Laboratory Agency at Weybridge, England, says scientists managed to infect a small percentage of mice fed a diet containing only 0.001 grams of infected material. They are continuing to monitor that mouse population so the number of positive cases may still increase with time. Mice studies, of course, do not transfer directly to cattle. The mice have shown a dose rate response, however, which means increasing the volume of the infected material fed increases the chance that an animal will become infected. In a separate study 70% of mice fed one gram of BSE-infected material tested positive for BSE 45 to 75 months after exposure. For practical purposes, researchers are now accepting that cattle can be infected by as little as 10 milligrams of infectious brain tissue. That amount wouldn't even fill the bottom of a teaspoon.

— Larry Thomas